

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

THOMAS CULLINAN, Individually and  
On Behalf of All Others Similarly Situated,

Plaintiffs,

v.

CEMTREX, INC., SAAGAR GOVIL,  
ARUN GOVIL and RENATO DELA  
RAMA,

Defendants.

Consolidated Case No.: 2:17-cv-01067

Judge Joseph F. Bianco

**NOTICE OF MOTION AND LEAD COUNSEL'S MOTION  
FOR AWARD OF ATTORNEYS' FEES, REIMBURSEMENT OF  
LITIGATION EXPENSES, AND AWARDS FOR LEAD PLAINTIFFS**

PLEASE TAKE NOTICE that, on May 22, 2019 at 1:30 p.m. before the Honorable Joseph F. Bianco, United States District Judge for the Eastern District of New York, upon the accompanying Memorandum of Law in Support of Lead Counsel's Motion for Award of Attorneys' Fees, Reimbursement of Litigation Expenses, and Awards for Lead Plaintiffs', dated May 1, 2019, the accompanying Declaration of Shannon L. Hopkins, dated May 1, 2019, the exhibits annexed thereto, all prior papers and proceedings herein, and such additional evidence or argument as may be presented at or before the hearing, the undersigned Lead Counsel will and do respectfully move this Court for entry of an Order (1) awarding Lead Counsel attorneys' fees in the amount of 25% of the Settlement Fund, or \$156,250, (2) approving reimbursement of litigation expenses incurred in this Action in the amount of \$24,591.85, and (3) awarding to Lead Plaintiffs \$32,000 (\$22,000 for Lead Plaintiff Khetarpal, and \$2,500 each for Lead Plaintiffs Benjamin Webb, Gang Chen, Timothy Heath, and Minh Nguyen.

A proposed order will be submitted with Lead Counsel's reply papers no later than May 15, 2019, after the deadline for objections has passed.

DATED: May 1, 2019

Respectfully Submitted,

**LEVI & KORSINSKY LLP**

/s/Shannon L. Hopkins

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*Additional Counsel for the Cemtrex Investor  
Group*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 1st day of May, 2019, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

*/s/Shannon L. Hopkins*

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Shannon L. Hopkins